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August 22, 2021

By ECF

Hon. Nicholas G. Garaufis  
United States District Court  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v Nancy Salzman  
18 Cr. 204 (NGG)

Dear Judge Garaufis:

Together with David Stern, I represent Nancy Salzman in the above-captioned matter. I write to request an extension of the date for defense submissions to and including September 1, 2021. No extension of the date for sentencing is sought and the government takes no position with respect to this application. The September 8, 2021 sentence date in this matter was fixed by Order of this Court on July 12, 2021. The current August 25 date for defense submissions was set August 12. We are now in receipt of the government's sentencing submission of August 18, together with seven victim impact letters served and filed that date, and two additional victim impact letters from the government served Friday, August 20. We seek additional time to meet and work with our client as to the new and very significant content raised in the nine victim impact statements, and to incorporate responses into our submission. As stated, no request to change the September 8, 2021 sentence date is sought, and we will be ready to move forward with sentence on that date.

Thank you very much for your consideration of this request.

Respectfully,

*Robert A. Soloway*

Robert A. Soloway

cc: AUSA Tanya Hajjar  
(By ECF)

RAS:sc

APPLICATION GRANTED in part, with a  
modification, as described on the Docket.  
SO-ORDERED.  
/s/ Nicholas G. Garaufis, U.S.D.J.  
Hon. Nicholas G. Garaufis  
Date: August 23, 2021